

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

V.

CRIMINAL NO: 1:15 CR 098

JAELYN DELSHAUN YOUNG

DEFENDANT JAELYN DELSHAUN YOUNG'S MOTION FOR CONTINUANCE

COMES NOW, Defendant Jaelyn Delshaun Young ("Young"), by and through his counsel of record, pursuant to Rule 12 of the Federal Rules of Criminal Procedure, and hereby respectfully moves the Court for a continuance of the trial setting in this matter for the calendar term beginning October 26, 2015. As grounds for this Motion, counsel submits as follows:

1. Young is charged with violating 18 U.S.C. §2339B(a)(1) and Section 2.
2. Young's original counsel's motion to withdraw was granted on October 13, 2015.
3. The undersigned received significant discovery that was produced in this case today, October 15, 2015. In addition to the many hours needed to review the anticipated discovery, Young needs additional time to properly investigate this matter. These documents need to be reviewed not only by counsel for Defendant but by prospective experts so that the Defendant can truly evaluate her defense. As such, Defendant's legal team needs more time to render effective assistance of counsel.
4. Young requests that this matter is reset during a trial calendar that is mutually convenient for the Government and the Defendant.
5. Young's counsel has conferred with the Government, and there are no objections to Young's Motion to Continue.

6. The factors articulated in Title 18, United States Code, Section 3161 (h)(7)(B)(ii) to determine the appropriateness of a continuance supports a continuance in that the ends of justice outweigh the best interest of the public and the defendant in a speedy trial in this cause.

7. Young respectfully requests the Court waive any supporting Memorandum of Law requirements.

WHEREFORE, the Defendant, Jaelyn Delshaun Young, by and through counsel, respectfully files this motion to continue the trial setting from its current setting of October 26, 2015.

Dated: October 15, 2015

Respectfully submitted:

JAELYN DELSHAUN YOUNG

By: /s/ Terris C. Harris, J.D., LL.M.

Terris C. Harris, J.D., LL.M. (MSB 99433)

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, the undersigned attorney of record for Defendant, do hereby certify that a true copy of the foregoing has been filed electronically. Notice of this filing was sent to all parties by operation of the Court's electronic filing system.

Dated: October 15, 2015

/s/ Terris C. Harris, J.D., LL.M.

Terris C. Harris, J.D., LL.M.